



Introduction

1 Which best describes your response?

on behalf of an organisation

2 Which area are you responding about?

specific proposed new town location

Crews Hill and Chase Park, Enfield, South Barking, Barking and Dagenham, Thamesmead, Greenwich

If you are responding about a wider region, please select which region you are responding about from the drop-down list:
London

3 What is your connection to the proposed location/region?

other

If you selected other, please expand here:
Local civic organization

4 If you are responding on behalf of an organisation, please select the type of organisation you are responding from below

charity

If you selected other, please expand here:

5 If you are responding on behalf of an organisation, what is the name of your organisation?

Please enter your answer here:
London Forum of Amenity & Civic Societies

6 If you are responding on behalf of an organisation, what size is your organisation?

not applicable / don't know

Section 3.1 - Assessment of locations

7 Thinking about the 13 locations listed, which location(s) do you believe have positive features that could help achieve the objectives of the New Towns Draft Programme?

Adlington, Cheshire East, Heyford Park, Cherwell, Marlcome, East Devon, Tempsford, Thamesmead, Greenwich, Wychavon Town, Worcestershire

What do you think the positive features of the location(s) you've selected are? Please enter your answer here:

Significant brownfield and greenfield site capable of connection to a wide area of employment if the necessary infrastructure is provided.

Clearly separated from another major town or city, with well-defined boundaries. Not located in a green belt.

8 Which of the 13 location(s) listed might face barriers which could hold back delivery of the New Towns Draft Programme objectives?

Chase Park and Crews Hill, Enfield, South Barking, Barking and Dagenham

What do you believe are the barriers to delivery in the location(s) you have selected? Please enter your comments here:

Chase Park and Crews Hill (Enfield) is mostly reliant on the Hertford loop which is often used as a diversionary route for inter-City services and has limited scope for enhancement of stations to provide suitable transport connections.

An existing economic base of garden centres, horticultural services and allied businesses would be eliminated. This would weigh against any economic benefits of the "new town", which are currently poorly defined.

The quality of this part of the green belt may be variable, but large parts are of high quality. Enfield Council has aimed to allow building on much of this area, but has been stymied by its green belt status. Designation as a new town under the proposed policy would greatly facilitate such building by creating "very special circumstances".

Hence this new town proposal seems to be primarily a means of bypassing national planning policy on the Green Belt. The original New Towns programme in the 1940s reinforced the green belt, and this programme should not undermine it.

There may be locations in this area that are suitable for substantial housing development, as they are on brownfield sites or genuine "grey belt" land. The strategy for this area should be based on that approach, not on creating an unneeded new town.

South Barking, Barking and Dagenham is not a distinct area that can define a new town. It is merely an undeveloped part of inner London. It should be developed within the framework of London planning policy and urban strategy under the terms of the London Plan. Existing planning policies and institutions, both local council and GLA, are quite capable of delivering phased development in an area such as this, without the pretence of creating a new town.

The fact that this location may deliver up to 48,000 new homes is irrelevant. The Olympic SPG area around Stratford targeted 32,000 homes, without pretending that it was a new town. As with the proposal in Enfield, this scheme for a new town appears to be designed to reduce planning scrutiny and constraints, rather than to create a new place.

Areas like South Barking etc are best developed in a manner that integrates closely with surrounding London areas. A new town is essentially self-contained. These areas should not be thus isolated, lest they compromise the integrated development of London. Infrastructure must be built in relation to immediately surrounding areas, whereas in standalone new towns reference is only to the place itself. The need to justify "new town" nomenclature could result in redundant or poorly justified features such as unneeded town centre development or poorly sited social infrastructure.

9 Do you think the SEA report has identified the main environmental issues relevant to the 13 locations?

No

Crews Hill and Chase Park, Enfield

If you selected no, please expand here and select which location(s) you are referring to from the list above:

We feel the shortcomings listed above have not been addressed, particularly with respect to the Enfield site.

10 Is there any additional environmental information about these locations that the SEA should take into account?

Not sure

If you answered yes, please tell us what additional information the SEA should consider:

11 Do you have any suggestions for practical mitigation measures to address any effects identified in the SEA report?

Not sure

If you answered yes, please set out the practical mitigation measures that should be considered:

12 Do you have any other feedback on the SEA report, including the issues and effects identified therein?

Enter your answer here:

Two of the sites in London (Crews Hill and Chase Park, and South Barking, Barking and Dagenham) are not genuine proposals for new towns. They are merely parts of London and its green belt which are proposed for development. This means that attempts to evaluate them within the SEA as new towns are not appropriate. The SEA methodology should be that conventionally employed for major schemes in London.

Section 3.3 - Proposed New Towns Locations

13 Do you think the 7 locations proposed by the government are the ones most likely to meet the programme's objectives?

No

If you answered no, please set out why you think the proposed locations do not meet the programme objectives here:

Of the seven locations, five would not meet Objective 1 as "a new place". Leeds South Bank, Manchester Victoria North, and Milton Keynes are parts of existing towns or cities. Crews Hill and Chase Park would be mere residential sprawl into London's Green Belt. Brabazon and West Innovation arc is a set of widely dispersed locations that cannot possibly be called a "place". Only Tempsford and Thamesmead can be new places.

For Crews Hill and Chase Park, Objective 2 (Economic Growth) appears to be satisfied merely because it would provide more housing. There is nothing special about this location in terms of growth in the London region. It is unlikely to "attract investment and talent" any more than other outer London areas.

With respect to Objective 4, Crews Hill and Chase Park faces Deliverability constraints. Deciding which of the better parts of the Green Belt should be eliminated will not be an easy task. This location is likely to face exceptionally strong public and political opposition (far greater than for non-green belt agricultural land). The site may also deter investors because it will have no room to grow, as a town should. It will be hemmed in by the surrounding Green Belt and the built-up areas of Enfield.

As to Objective 5 (Placemaking), provision of infrastructure at Crews Hill and Chase Park may be hampered by the need for further work on the Green Belt outside the identified new town boundaries.

Section 4.1 - Government offer

14 Do you agree with the overall government offer for proposed new town locations?

No

If you answered no, is there any additional support you think should be offered? Please enter your answer here:

As stated above, we do not believe that many of the proposed locations are "new towns". Hence the "government offer" is irrelevant. The government could save itself a lot of effort and cost by concentrating on the areas that genuinely require its intervention because they are greenfield locations outside existing town or city authorities.

Where a location is a part of an existing city or town, there is no justification for taking responsibility for development away from the local authorities that are responsible for the wider area. The GLA and the borough councils should have oversight of the London locations (Enfield and Barking) as would be the case for any other major development area in the city. The existing planning system and the government support provisions are adequate. The same principle doubtless applies to the the locations in Leeds, Manchester, Milton Keynes, and Plymouth.

The New Towns Taskforce recommended strongly that development of new towns should be overseen by Development Corporations. The government offer as described is far too vague on this matter, limiting this to "where appropriate".

15 Do you think there are any additional interventions that government should consider to ensure design and placemaking quality in new towns?

Not sure

If you answered yes, please set out the additional interventions government should consider:

Section 4.2 - New Towns planning policy

16 How clear do you find the proposed planning policy?

somewhat clear

If you answered somewhat unclear or very unclear, which elements are unclear and how would you suggest changing them? :

The policy contains a fundamental flaw. It fails to define adequately what is meant by the term "new town".

The New Town Taskforce stated that new towns: "need not be limited to green field sites but can include urban extensions and even the remodelling of existing city centres as long as the new community has a clear and distinct identity."

We do not believe that locations such as South Barking and Dagenham will develop a "clear and distinct identity", nor will Chase Park and Crews Hill. These will take on the identity of the adjacent areas of London. The same applies to other locations within cities (Manchester, Leeds, etc).

For people who live in a place to share a clear and distinct identity that arises from that place, the place must either serve a very distinct socioeconomic group or be geographically distinct from other places. Neither will apply to the locations mentioned above.

As a result, the only feature that all the locations share is that they are large areas of land that will deliver a substantial number of homes. That is not enough to put forward a coherent policy for all these places.

The policy is meant to be building upon the past experience of new town development in the UK, which is very substantial. This applied to stand-alone new towns, generally in greenfield locations. There is no corresponding experience for "new towns" within or adjacent to cities.

The result of trying to develop a single policy for such very different areas will be confusion. The policy will not be optimised either for the urban locations or for the stand-alone ones.

In its current form, the policy gives the impression of being more a vehicle for accelerating housing delivery than a way of realising a vision of new towns for the 21st century.

The government would have done well to update the definition of new towns adopted by the New Towns Committee in 1945 (under Lord Reith):

- New Towns should be located sufficiently far from their mother city at least 40km from London and 20km from other metropolises.
- They should target a population of 20,000 to 60,000 inhabitants.
- They should feature predominately single-family housing, at low densities.
- They should be built, as far as possible, on quality greenfield sites, but outside areas of exceptional natural beauty, which have to be preserved.
- A green belt should be created around the New Towns.
- Housing should be organised in neighbourhood units around a primary and nursery school, a pub and shops selling staple goods, and a meeting-room

for clubs and voluntary groups to meet.

- The New Towns should seek to attract a balance of all socio-economic groups.
- In order to be self-contained, the development corporation must offer every business moving into the new town one housing unit for each job created.

This definition, and the vision that sustained it, eventually delivered 32 new towns that are now home to 2.8 million people. One wonders whether this new policy will be as productive.

17 Do you think establishing placemaking principles in the proposed planning policy is an effective way to implement the placemaking ambition of the programme?

Yes

If you answered no, how do you think the placemaking principles should be implemented?:

18 Do you think the proposed planning policy provides sufficient flexibility to new town locations to meet the placemaking principles?

Not sure

If you answered no, what other measures could create a flexible approach to the placemaking principles? Please enter your answer here:

19 Is establishing a 40% target for affordable housing an effective way of delivering an ambitious number of affordable homes?

No

If you answered no, what changes to the target are needed? Please enter your answer here:

All housing should be affordable to someone. The proportion of social housing: key worker housing: market housing should reflect the proportion of people needing those categories. The 40% of affordable homes as it is currently defined is way too low.

20 Is the proposed planning policy on giving substantial weight in decision-making to the social and economic benefits of new towns clear?

Not sure

If you answered no, please provide your reasons here:

21 Do you agree with the government's approach to decision-making policy on the Green Belt?

No

If you answered no, what further changes to plan-making or decision-making policy needed to deliver sufficient clarity? Enter your answer here:

It must be made clear that the restrictions are non-negotiable and not just a starting bid for developers to beat down.

Placing a new town on the green belt of another town or city seems absurd. While some development on a green belt may be justified, anything on the scale of a new town destroys the green belt over a wide area.

A development such as Chase Park and Crews Hill would go against the core principle of London's green belt, which is to prevent urban sprawl.

Locating new towns within a green belt is also likely to lead to encroachment on the green belt beyond its officially defined area. This will be needed for infrastructure, but will also occur over time due to the imperatives of growth. Towns that are to be dynamic and prosperous usually need some leeway to expand.

This is also not an appropriate time to be developing a whole new approach to the green belt within the new towns policy. The recent NPPF defined new general policies for the green belt. It will take time for the application of these policies to be defined and for experience of their use to develop. This experience may well lead to modifications of policies. Any consideration of new towns on green belt land should take place after the general policy on green belt development has been fully articulated and tested.

22 Do you think the proposed planning policy is sufficient for the purposes of safeguarding land for development as new towns?

Not sure

If you answered no, how could the policy statement go further? Enter your answer here:

23 Do you think any additional planning policies are needed to support the delivery of the programme objectives?

Not sure

If you answered yes, please provide details here:

Final questions

24 Do you have any views on any potential impacts of the New Towns Draft Programme on people or groups with protected characteristics?

Please provide comments here:

25 Is there anything else you would like to tell us that you think is relevant to this consultation but has not been covered in previous questions?

Enter your answer here: